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10 *Counsel for Richard A. Marshack,
11 Liquidation Trustee of the LPG Liquidation
12 Trust*

13 **UNITED STATES BANKRUPTCY COURT
14 CENTRAL DISTRICT OF CALIFORNIA
15 SANTA ANA DIVISION**

16 In re
17 THE LITIGATION PRACTICE
18 GROUP P.C.,
19 Debtor.

20 Case No.: 8:23-bk-10571-SC

21 Chapter 11

22 **DECLARATION OF CHRISTOPHER
23 GHIO IN SUPPORT MOTION FOR
24 ENTRY OF ORDER ENFORCING
25 AGREEMENT OF PURCHASE AND
26 SALE AND JOINT ESCROW
27 INSTRUCTION, AND COMPELLING
28 MORNING LAW GROUP, P.C. TO
 MAKE PAYMENT THEREUNDER AND
 RELATED RELIEF**

29 Date: April 23, 2025
30 Time: 1:30 p.m.
31 Judge: Hon. Scott C. Clarkson
32 Place: Courtroom 5C
33 411 W. Fourth Street
34 Santa Ana, CA 92701

1 I, Christopher Ghio, declare as follows:

2 1. I am a partner at the offices of Dinsmore & Shohl LLP, special counsel to Richard
3 A. Marshack, Liquidating Trustee (the “Trustee”) of the LPG Liquidating Trust (the “Trust”), in
4 the above-captioned bankruptcy case (the “Bankruptcy Case”) of The Litigation Practice Group
5 P.C. (the “Debtor”). I make this declaration in support of the Trustee’s *Motion for Entry of Order*
6 *Enforcing the Agreement of Purchase and Sale and Joint Escrow Instruction, and Compelling*
7 *Morning Law Group, P.C. to Make Payment Thereunder and Related Relief* (the “Motion”).¹ I
8 am over the age of 18, except as otherwise indicated herein I have personal knowledge of the facts
9 set forth herein or have obtained familiarity with such facts from persons knowledgeable of them,
10 and if called upon to testify, could and would do so.

11 2. On January 15, 2025, MLG provided its quarterly calculation of the Earn-Out due
12 to the Trust. Attached hereto as **Exhibit “1”** is a true and correct copy of MLG’s quarterly
13 calculation of the 2024 Fourth Quarter Earn-Out.

14 I declare under penalty of perjury that the foregoing is true and correct.

15 Executed this 2nd day of April 2025.

16 
17 Christopher Ghio

27 ¹ Capitalized terms not defined herein have the meanings assigned to them in the Motion.

EXHIBIT 1

[EXHIBIT SUBJECT TO PENDING MOTION TO FILE UNDER SEAL]

1 PROOF OF SERVICE OF DOCUMENT

2 I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business
3 address is 10250 Constellation Boulevard, Suite 900, Los Angeles, CA 90067.

4 A true and correct copy of the foregoing documents entitled: DECLARATION OF CHRISTOPHER
5 GHIO IN SUPPORT OF MOTION FOR ENTRY OF ORDER ENFORCING AGREEMENT OF
6 PURCHASE AND SALE AND JOINT ESCROW INSTRUCTION, AND COMPELLING MORNING
7 LAW GROUP, P.C. TO MAKE PAYMENT THEREUNDER AND RELATED RELIEF on the judge in
8 chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

9 **1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant
10 to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and
11 hyperlink to the document. On 4/02/2025, I checked the CM/ECF docket for this bankruptcy case or
12 adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to
13 receive NEF transmission at the email addresses stated below:

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- **Johnny White** JWhite@wrslawyers.com, jlee@wrslawyers.com
- **Reina Zepeda** rzepeda@omniagn.com

2. **SERVED BY UNITED STATES MAIL:** On 4/02/2025, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows:

See attached for additional parties

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on 1/08/2025, I served the following persons and/or entities by personal delivery, mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

The Honorable Scott C. Clarkson
United States Bankruptcy Court, Central District of California
411 West Fourth Street, Suite 5130 / Courtroom 5C
Santa Ana, CA 92701-4593

1 I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

2 4/02/2025

Kimberly Hoang

3 Date

Printed Name

/s/ Kimberly Hoang

Signature

6 **Additional Parties Served by U.S. Mail**

7 **Creditors who have the 20 largest unsecured claims**

8 Debt Validation Fund II, LLC
5075 Lower Valley Road,
9 Atglen, PA 19310

10 MC DVI Fund 1, LLC; MC
DVI Fund 2, LLC
11 598 Cottonwood Dr.,
Glenview, IL 60026

12 Validation Partners LLC
1300 Sawgrass Pkwy, Ste. 110
13 Sunrise, FL 33323

14 Marich Bein LLC
15 99 Wall Street, Ste 2669
New York, NY 10005

16 Business Centers of America
17 1100 Sir Francis Drake Blvd,
Ste 1, Kentfield, CA 94904

18 JP Morgan Chase
19 3 Park Plaza, Ste 900
Irvine, CA 92614

20 CA Franchise Tax Board
21 PO Box 942857
Sacramento, CA 94257-0511

22 Outsource Accelerator Ltd
23 City Marque Limited
Unit 8801-2 Bldg. 244-248
24 Des Voeux Rd.
Central Hong Kong

25 Collaboration Advisors
400 Dorla Court
26 Zephyr Cove, NV 89448

28 Anthem Blue Cross
PO Box 511300
Los Angeles, CA 90051-7855

1 Azevedo Solutions Groups, Inc.
2 420 Adobe Canyon Rd.
3 Kenwood, CA 95452

4 Debt Pay Pro
5 1900 E Golf Road, Suite 550
6 Schaumburg, IL 60173

7 Sharp Business Systems
8 8670 Argent St
9 Santee, CA 92071

10 Tustin Executive Center
11 1630 S Sunkist Street, Ste A
12 Anaheim, CA 92806

13 Exela Enterprise Solutions
14 2701 E. Grauwyler Road
15 Irving, TX 75061

16 Netsuite-Oracle
17 2300 Oracle Way
18 Austin, TX 78741

19 Credit Reporting Service Inc
20 548 Market St, Suite 72907
21 San Francisco, CA 94104-5401

22 Document Fulfillment Services
23 2930 Ramona Ave #100
24 Sacramento, CA 95826

25 Executive Center LLC
26 5960 South Jones Blvd
27 Las Vegas, NV 89118

28 LexisNexus
15500 B Rockfield Blvd
Irvine, CA 92618

22 **Secured Creditors**

23 Diverse Capital LLC
323 Sunny Isles Blvd., Suite 503
24 Sunny Isles, FL 33154

25 City Capital NY
1135 Kane Concourse
26 Bay Harbour Islands, FL 33154

27

28